

GIBBONS P.C.

Robert K. Malone, Esq.
Brett S. Theisen, Esq.
One Pennsylvania Plaza, 37th Fl.
New York, New York 10119
Telephone: (212) 613-2000
Facsimile: (212) 290-2018
E-mail: rmalone@gibbonslaw.com
btheisen@gibbonslaw.com

Counsel for FCA US LLC

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

OLD CARCO LLC, *et al.*,

Debtors.

Chapter 11

Case No. 09-50002 (MG)

(Jointly Administered)

**DECLARATION OF ANDREW M. MAST, ESQ.
PURSUANT TO 28 U.S.C. § 1746 IN SUPPORT OF FCA US LLC'S
MOTION TO ENFORCE THE COURT'S SALE ORDER**

ANDREW M. MAST, ESQ. declares as follows:

1. I am a member of Bush Seyferth PLLC, counsel for FCA US LLC ("FCA") in the Takata Airbag Products multidistrict litigation (the "Takata MDL") and in the above-captioned proceedings. I am one of the responsible attorneys for *FCA US LLC's Motion to Enforce the Court's Sale Order [Docket No. 3232]* (the "Motion") and as such I have personal knowledge of the facts and statements herein.

2. I submit this declaration in further support of the Motion and to provide the Court with copies of certain materials filed on this Court's docket and referenced in the Motion.

3. Attached as Exhibit M is a true and correct copy of *Deviation for TRW Inflator* dated June 28, 2013.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge and belief, that the foregoing is true and correct.

Executed on: November 19, 2021
Troy, Michigan

By: /s/ Andrew M. Mast
Andrew M. Mast

EXHIBIT M

Supplier DOC# SPI2 EVO TRW 0001

CHRYSLER

ENGINEERING STANDARD - REQUEST FOR EXCEPTION

Company: TRW Automotive Mesa and Laage Operations Contact: Ann Ling Phone/Fax: 480-722-6256
480-600-3982
Assy/Component: MY: 2014+ Model:
Part Number: Inflator Assemblies Submission Date: 6/28/2013
SPI2 EVO
Performance Standard: SAE/USCAR -24-2 Title: USCAR inflator Technical Requirements and Rev: 2
April 2013 Validation
Paragraph: 3.2.7 Standard Author: USCAR committee

REQUIREMENT: (Copy below the complete text of the paragraph(s) of the performance standard for which an exception is being sought. Longer sections may be attached as separate pages.)

Page 21

TABLE 3.2.7.A - INFLATOR VARIABILITY LIMITS		
Inflator Variability Parameters		
(for Closed Tank Tests)		
<input type="checkbox"/> 3 Standard Deviation and TTFG Attribute Limits		
Time at P=10% of peak	T10% of peak	$t(10\% \text{ of peak}) \pm (30\% * t(10\% \text{ of peak}))$ i.e. $T10 \pm (0.3 * T10)$
Time at P=25% of peak	T25% of peak	$t(25\% \text{ of peak}) \pm (20\% * t(25\% \text{ of peak}))$ i.e. $T25 \pm (0.2 * T25)$

EXCEPTION: (Identify exactly what exception to the performance standard is being requested with detail of supporting circumstances. Additional supporting data and/or test summaries may be attached as separate pages. Submit to Chrysler Core Restraints Performance Representative with Supplier Business Unit Manager signature approval.)

TRW is requesting Exception to the gate defined as Time to 10% of Peak pressure and Time to 25% of Peak Pressure to be evaluated as to be evaluated $\pm 35\%$ and $\pm 25\%$ as detailed below

Time at P=10% of peak	T10% of peak	$t(10\% \text{ of peak}) \pm (35\% * t(10\% \text{ of peak}))$ i.e. $T10 \pm (0.35 * T10)$
Time at P=25% of peak	T25% of peak	$t(25\% \text{ of peak}) \pm (25\% * t(25\% \text{ of peak}))$ i.e. $T25 \pm (0.25 * T25)$

Based on TRW Laage Serial Production data and preliminary Mesa data, Time to 10% and Time to 25% of peak pressure fall within the bounds as defined for TTFG by SAE/USCAR-24 -2. As the Actual values are small $< 4\text{ms}$ at $+23^\circ\text{C}$ and < 5 at -40°C the increase is needed account for test variation.

Supplier Business Unit Manager: Sven Sero

REQUESTER - DO NOT WRITE BELOW THIS LINE

DISPOSITION: (Describe exact response to request with supporting explanation. Submit for management approval with both Core Restraints and Product Team signatures completed.)

CC: Core & Product Team Engineer/s, Core & Product Team Manager/s, Supplier Quality Specialist, Buyer, Specification Author
(NOTE: Original is to be maintained at the requesting supplier.)

Revised: July 7, 2004

Deviation Approval Date: _____ Deviation Expiration Date: _____
Approval: _____ Approval: _____ Concurrence: _____
Core Restraints Engineer Core Restraints Supervisor Product Team Restraints Program Leader

Approval: _____ **Concurrence:** _____
(Core Restraints Manager) (Product Team Restraints Manager(s))

Requestor Notification:

Made to: _____ How: _____
Date/Time: _____ By: _____
CN #: _____ IAA#: _____

(NOTE: The exception is not official until documented on the drawing with a CN)

CC: Core & Product Team Engineer/s, Core & Product Team Manager/s, Supplier Quality Specialist, Buyer, Specification Author
(NOTE: Original is to be maintained at the requesting supplier.)

Revised: July 7, 2004